

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

CONN'S, INC., *et al.*¹

Debtors.

Chapter 11

Case No. 24-33357 (ARP)

(Jointly Administered)

**CERTIFICATE OF COUNSEL REGARDING
THE SETTLEMENT BETWEEN THE DEBTORS,
BRF FINANCE CO., LLC, ND THE AD HOC GROUP OF DEALERS**

(Related to Docket Nos. 1575)

Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned proposed counsel for the above-captioned debtors (collectively, the “Debtors”) certifies as follows:

1. On March 21, 2025, the Debtors filed the *Debtors’ Emergency Motion for Entry of an Order (I) Approving Global Resolution and Settlement of Certain Disputes Between the Debtors, BRF Finance Co., LLC, and the Ad Hoc Group of Badcock Dealers Pursuant to Federal Rule of Bankruptcy Procedure 9019; (II) Approving Procedures for Dealers that Are Not Members of the Ad Hoc Group to Opt Out of Participation in the Settlement, and (III) Granting Related Relief* [Docket No. 1575] (the “Dealer Settlement Motion”), by which the Debtors sought approval by the Court of a settlement with the Dealers (as defined in the Dealers Settlement Motion).

¹ The Debtors in these chapter 11 cases, together with the last four digits of each Debtor’s federal tax identification number, are: Conn’s, Inc. (2840), Conn Appliances, Inc. (0706), CAI Holding, LLC (2675), Conn Lending, LLC (9857), Conn Credit I, LP (0545), Conn Credit Corporation, Inc. (9273), CAI Credit Insurance Agency, Inc. (5846), New RTO, LLC (6400), W.S. Badcock LLC (2010), W.S. Badcock Credit LLC (5990), and W.S. Badcock Credit I LLC (6422). The Debtors’ service address is 10077 Grogan’s Mill Road Suite 303, The Woodlands, TX 77380.

2. On March 31, 2025, the Debtors filed the *Notice of Revised Proposed Order* [Docket No. 1606] (the “Revised Order”), noticing a revised version of the proposed order in the Dealer Settlement Motion.

3. A hearing on approval of the Dealer Settlement Motion was held on March 31, 2025 before the Honorable Alfredo R. Pérez of the United States Bankruptcy Court for the Southern District of Texas (the “Court”), whereby the Court approved the Proposed Order, subject to certain comments made by the Court at the March 31 hearing.

4. The attached order (the “Further Revised Proposed Order”) incorporates the Court’s comments and the comments of counsel.

5. The undersigned counsel certifies that the attached Further Revised Proposed Order, attached hereto as **Exhibit A**, reflects all comments from the Court. A redline reflecting the changes between the Further Revised Proposed Order and the Revised Order is attached hereto, as **Exhibit B**.

[Remainder of page intentionally left blank.]

The Debtors request that the Court enter the attached revised proposed order at the earliest convenience of the Court.

Dated: April 1, 2025

Houston, Texas

/s/ Jeri Leigh Miller

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Counsel to the Debtors and Debtors in Possession

Certificate of Service

I certify that on April 1, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Jeri Leigh Miller

Jeri Leigh Miller